

## **REMARKS**

This Amendment is responsive to the Office Action dated February 28, 2007. Claims 13-20 were pending in the application. In the Office Action, claims 13-20 were rejected. In this Amendment, claim 13 was amended. Claims 13-20 now remain for consideration.

Applicant submits that claims 13-20 are in condition for allowance and requests withdrawal of the rejections in light of the following remarks.

Applicant respectfully requests that this Action, which was made final, be withdrawn in accordance with MPEP 706.07(b). Please note also that the "Office Action Summary" transmittal indicates that the "Status" of this action is both "final" and "non-final." See Office Action Summary, 2a and 2b, respectively.

### **§ 112 Rejections**

The rejections of claims 13, 14 and 20 under 35 U.S.C. 112, second paragraph are respectfully traversed.

Claim 13 was rejected for insufficient antecedent basis for the limitation "the movements" in line 11. Claim 13 was amended by deleting the word "the" and adding "a plurality of" in accordance with Examiner's suggestion.

Claim 14 was rejected based on a discrepancy that the battery 24 is housed in movement 15, which is separate from dial 2. In fact, movement 15 is not separate from dial 2. Page 8, lines 26-27 of Applicant's specification states that "the first movement 15 is located in the bottom right corner of the watch casing 7." Page 9, lines 4-5 states that "a dedicated power source, such as a battery 24, is housed within the movement 15." Page 9, line 10 states that dial 2 "encloses the movement 15 ..." Accordingly, because

the dedicated power or battery 24 is housed within movement 15, and movement 15 is enclosed by dial 2, dial 2, consequently must include a “power source,” as recited in claim 14.

Although Examiner rejected claim 20 under 35 U.S.C. 112, Examiner has not set forth the basis of this rejection. Accordingly, Applicant is unable to respond to this rejection and respectfully traverses same.

### § 103 Rejections

Applicant respectfully traverses the rejection of claims 13-17 and 19-20 under 35 U.S.C. 103(a) as being unpatentable over Howard (USPN 3,277,646) in view of Affolter (USPN 5,003,035). Applicant also respectfully traverses the rejection of claim 18 under 35 U.S.C. 103(a) as being unpatentable over Howard and Affolter in further view of Yeung (GB 2,194,081).

MPEP §§ 2144-2144.09 set out the types of evidence that an examiner may rely upon in support of a 35 U.S.C. 103 rejection. The source of rationale supporting a 103 rejection may be in a reference or reasoned from common knowledge in the art, scientific principles, art-recognized equivalents, or legal precedent.

With respect to the claimed invention, a watch mechanism is disclosed having a plurality of movements, wherein each movement is capable of operating independently of each other movement. This is supported throughout the specification (See, e.g., page 6, lines 12-17). This feature is claimed in amended independent claim 13.

Examiner admits that Howard does not specifically indicate that each dial/movement is capable of operation following removal of any other movements. Examiner also states that Howard discloses a watch mechanism including a plurality of

replaceable movements 20, 22, 24, 26, 28 each having dials 30, *and capable of operating independently of each other* (emphasis added). It is respectfully submitted that Howard, Affolter and Yeung, either taken alone or in combination, do not indicate that the movements are capable of operating independently of each other. It appears that Examiner is referring to Howard, column 2, lines 12-25. There is no suggestion of independent operation of movements throughout the entire Howard reference, nor in Affolter or Yeung.

Furthermore, Howard, Affolter and Yeung neither disclose nor suggest that the watch device provides separately operable and settable movements.

Accordingly, it is respectfully submitted that Examiner has failed to “point to some concrete evidence in support of” his findings (MPEP 2144). It follows that there is no evidence to support the conclusion that it would be obvious for one of ordinary skill in the art to make movements completely independent such that each may be removed without affecting the operation of the other.

Claims 14-20 depend on claim 13. Since claim 13 is believed to be patentable over Howard and Affolter and Yeung, taken alone or in combination, claims 14-20 are believed to be patentable over Howard, Affolter and Yeung on the basis of their dependency on claim 13.

### CONCLUSION

Applicant respectfully submits that all of the claims now pending in the application are in condition for allowance, which action is earnestly solicited.

If any issues remain, or if the Examiner has any further suggestions, he/she is invited to call the undersigned at the telephone number provided below.

A check in the amount of \$905 is enclosed for a three-month extension (\$510.00) and a Request for Continued Examination (\$395.00).

The Examiner is hereby authorized to charge any insufficient fees or credit any overpayment associated with the above-identified application to Deposit Account No. 06-0515.

Respectfully submitted,  
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